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September 19, 2022

By ECF

Honorable Sanket J. Bulsara
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Government Employees Insurance Company, et al. v. Zaitsev, M.D. et al.*
Docket No. 20-cv-03495-FB-SJB

Dear Judge Bulsara:

We represent Plaintiffs (collectively “GEICO” or “Plaintiffs”) in the above-referenced matter. Together with counsel for all remaining Defendants, we jointly and respectfully write to request entry of a one-month extension of the expert discovery schedule.

In particular, the parties respectfully request that the Court amend the expert discovery deadlines as follows:

- Deadline to serve affirmative expert reports extended from October 15, 2022¹ to November 30, 2022;
- Deadline to serve rebuttal expert reports extended from November 15, 2022 to December 30, 2022; and
- Deadline to complete all discovery, including expert depositions, extended from December 15, 2022 to January 31, 2023.

This request is made jointly and for good cause. Plaintiffs are currently working diligently with their experts to complete their reports in advance of the upcoming deadlines. However, due to the complexity of the issues presented in this case, coupled with the large volume of documents needed to be processed,

¹ On June 29, 2022, the Court set deadlines of (i) September 1, 2022 for service of affirmative expert reports; (ii) October 1, 2022 for service of rebuttal expert reports; and (iii) October 31, 2022 for the completion of all discovery. See June 29, 2022 Docket Entry. On July 5, 2022, the Court extended the deadline for the completion of all discovery 45 days to December 15, 2022, but did not specifically extend the deadlines for service of affirmative and rebuttal expert reports. See July 5, 2022 Docket Entry. The parties have been operating with the understanding that the deadlines for service of affirmative and rebuttal reports are currently October 15, 2022 and November 15, 2022, respectively.

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transferred, and reviewed, Plaintiffs and their experts have experienced some interruptions in this process that have delayed the completion of the reports. In addition, the requested extension accounts for holiday-related delays later in the year. Therefore, together with counsel for the Defendants, Plaintiffs respectfully request a 45-day extension of the remaining deadlines so as to allow the parties to complete the expert discovery process and move this matter towards dispositive motion practice in early 2023.

We appreciate the Court's time and continued attention to this matter.

Respectfully submitted,

RIVKIN RADLER LLP

/s/ Steven T. Henesy
Steven T. Henesy

cc: All counsel via ECF